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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUNRISE HOSPITAL AND MEDICAL CENTER,  
LLC; SUNRISE MOUNTAINVIEW HOSPITAL,  
INC.; and SOUTHERN HILLS MEDICAL  
CENTER, LLC,

Plaintiffs,

vs.

BLUE CROSS OF CALIFORNIA D/B/A ANTHEM  
BLUE CROSS; ANTHEM BLUE CROSS LIFE AND  
HEALTH INSURANCE COMPANY; and KEENAN &  
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY

**STIPULATION AND ORDER TO EXTEND  
PLAINTIFFS' TIME TO RESPOND TO  
DEFENDANT KEENAN & ASSOCIATES,  
INC.'S MOTION TO DISMISS  
(ECF No. 23)**

**(FIRST REQUEST)**

Plaintiffs Sunrise Hospital and Medical Center, LLC; Sunrise Mountainview Hospital, Inc.;  
and Southern Hills Medical Center, LLC ("the Hospitals") and Defendant Keenan & Associates, Inc.  
("Keenan") (collectively, the "Parties") hereby stipulate as follows:

1. Keenan's Motion to Dismiss and Memorandum of Law ("Motion to Dismiss") in this  
action was filed on January 19, 2024 (ECF No. 23).

2. The Hospitals' current deadline to respond to the Motion to Dismiss is February 2,  
2024.

3. Due to the schedules of the Hospitals and their counsel, the Hospitals require additional time to prepare their response to the Motion to Dismiss.

4. The Parties therefore stipulate and agree to extend the deadline for the Hospitals to file their response to the Motion to Dismiss to February 21, 2024.

5. This is the Hospitals' first requested extension. This stipulation is made in good faith and not to delay the proceedings.

Dated this 30th day of January, 2024.

**BAILEY ♦ KENNEDY**

By: /s/ Joshua M. Dickey

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Dated this 30th day of January, 2024.

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*Attorneys for Defendant Keenan & Associates, Inc.*

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: February 2, 2024